

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Keep radio club name confidential

Keep my name confidential

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:

I agree the bands should be made available to all full licencees in the same way as those bands where we are secondary users.

paragraph 2.26.3

No protection from "electronic equipment! is basically Ofcoms way of abrogating their statutory responsibility to enforce EMC / interference regulations and standards on commercial equipment on sale to the general public. example being power supplies and chargers in equipment sold without emc interference components being fitted to save costs yet still carrying CE markers.

Like wise sub standard equipment is more likely to be effected by external rf fields whereas if the unit were built to correct standards it would be by definition less prone to interference.

paragraph 2.26.6 near field measurements at the frequencies and power levels in use are difficult to make with any accuracy and are largely irrelevant.

Question 2:Do you agree that expressly linking a Full (Club) Licensee?s authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include

circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

Club licences should be made transferable between members (officers) of a radio club. The current procedure of surrendering of the licence by current holder and the application by the person wishing to take on the licence with no guarantee it will be issued is contrary to normal democratic process of club officer election / rotation. I am currently the holder of 3 club licences for my club Gordano Amateur Radio Group. I was Honorary Secretary for the club and as part of this role licence holder. I recently handed the Secretary role to a fellow club member. The costs associated with this to Ofcom made it such it was economically unsustainable to the club. The club constitution was revised to allow me to keep the licences.

In other regards I agree the club licences should be revoked if the holder leaves / is not a member of the named club.

There should be due regards for licence transfer provision in the case of death / demise of a club licence holder to another club member / officer

Question 3:Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person'?:

Question 4:Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:

The automatic revocation of a licence because of lack of revalidation is wrong on all fronts. There is a significant section, almost a majority of radio amateurs that are of an age they have not / cannot include computers and the internet in their repertoire.

In the spirit of equality it is entirely wrong to charge for paper revalidation whilst it is free on line.

Question 5:Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:

Again it is wrong on all fronts to charge for a paper licence and free on line. Ofcom in common with most Government department ascribe to equality without any bias to AGE, disability, gender, race, orientation and a number of other categories so why charge one group and free for another.

Therefore equality must be corrected before any updating / correction of the licence and conditions booklet being undertaken.

Question 6:Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:

Identification on a routine basis should be in the transmission mode currently in use At the end of transmission or every 15 minutes whichever is the sooner

Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:

Station identifiers are well known internationally and therefore any change would cause confusion to the international community.

Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:

The question is unclear. however I take it to mean that a 2E station whose main address is in England would keep the 2E if they were for instance in Wales on a temporary basis where 2W would be the current norm. Surely the need / wish for the distant station to know where the station is located without have recourse to the station having to give Maidenhead locator square or similar. QSL info is routed through main station call.

Part of this problem is the Ofcom databases show incorrect 2nd character in the call sign GX and other characters shown.

Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:

This would make the licence conditions for both instances clearer.

Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:

Probably